

FILED

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURTfor the
Western District of TexasMAY 29 2014
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY K. J. [Signature]
DEPUTY CLERK

United States of America)

v.)

JONATHAN WILLIAMS (1))

NEELA ARJOONSINGH (2))

MELISSA BARNES (3))

Case No. 5:14-MJ-587Defendant(s)**CRIMINAL COMPLAINT**

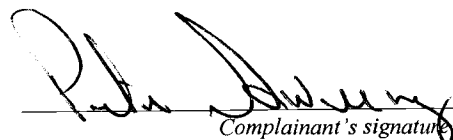
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 27, 2014 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:*Code Section*
18 U.S.C. 2421 and 2*Offense Description*
Transportation Generally and Aiding & Abetting.

PENALTIES: Up to 10 years imprisonment, \$250,000 fine, 3 years supervised release, \$100 mandatory special assessment.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.
Complainant's signaturePeter Sweeney, FBI SFO
Printed name and title

Sworn to before me and signed in my presence.

Date: 05/28/2014City and state: San Antonio, Texas
Judge's signature
HENRY J. BEMPORAD, US MAGISTRATE JUDGE
Printed name and title

10 years confinement, \$250,000 Fine or both; 3 years supervised release; \$100 mandatory special assessment

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Peter Sweeney, being duly sworn do hereby depose and state as follows:

I am a San Antonio Police Department (SAPD) Detective assigned to the Federal Bureau of Investigation (FBI) Crimes Against Children Task Force and have been so employed since 2011. I have been a San Antonio Police Detective for approximately 17 years. I have conducted numerous investigations relating to criminal violations of state and federal law, including violations of Title 18. My experience includes substantial involvement in the investigation of crimes involving the exploitation of children on a state and federal level for approximately 10 years.

This is an affidavit in support of an arrest warrant for Jonathan Williams, Neela Arjoonsingh, and Melissa Barnes for violating Title 18, United States Code, Sections 2421 and 2, Transportation Generally and Aiding and Abetting.

On April 11, 2014, the San Antonio Police Department was contacted by the victim's mother stating that she had not seen nor heard from her adult daughter (hereafter referred to as AV1) in several weeks. All logical attempts to locate AV1 by SAPD were negative. Attempts to ping the victim's cell phone were unsuccessful.

On May 23, 2014, the victim's mother contacted SAPD and reported that AV1 placed a frantic phone call to AV1's last place of employment (a local strip club) in San Antonio, Texas. AV1 asked the club's receptionist to call her mother and advised the mother that she was being held against her will in a Tampa, Florida at a LaQuinta Inn motel room.

AV1 advised the receptionist that she had been beaten and forced to prostitute. SAPD Detective Sweeney contacted the management staff at the LaQuinta Inn regarding the outcry from AV1. The hotel manager confirmed that AV1 and other unknown females did check into the motel on May 20, 2014 and checked out on May 21, 2014. The Manager could only give a vehicle description of a black SUV type truck. She also provided law enforcement with a registration card which was used to register the room. The registration card stated that Neela Arloonsingh was the registrant for room #310 on said date.

On May 27, 2014, a receptionist from AV1's last place of employment, contacted SAPD Detectives and reported that AV1 had just called her asking if she could provide her with her mother's cell phone number, to which the receptionist complied. The receptionist provided law

enforcement with the phone number that AV1 had just called from. The receptionist stated that AV1 was whispering through the phone when she called her requesting her mother's information. At the same time, AV1's mother contacted Detective Sweeney and stated that AV1 called her and stated that she was being held in motel room #245 in North Carolina against her will. SAPD was able to trace the call back to the Quality Inn, located at 440 Griffith Street, Charlotte, North Carolina.

SAPD contacted Charlotte Mecklenburg Police Department for assistance. Charlotte law enforcement was provided the given information and arrived at the Quality Inn. Charlotte law enforcement knocked on room#245 and identified themselves and their purpose. AV1 was located along with Neela Arjoonsingh. Multiple motel rooms (4) were registered to Jonathan Williams and Neela Arjoonsingh at the Quality Inn Motel, Charlotte, North Carolina. AV1 advised that Williams and Barnes were not currently located in the motel. Law enforcement set up surveillance around the motel and observed Williams and Barnes approach the vehicle which AV1 identified as belonging to them, and detained them.

Charlotte Mecklenburg Police Detectives interviewed AV1 at their headquarters. AV1 stated she met Williams and Barnes at her place of employment in San Antonio, where they told her she could make a lot of money if she went with them and danced at nightclubs in different cities. Believing she would be dancing for money, she agreed to go with them. AV1 told law enforcement she was soon told she would be prostituting with them for money. AV1 stated she was advertised on internet websites by Williams, Arjoonsingh and Barnes, as an escort. AV1 informed officers that she was threatened, beaten, and coerced to prostitute by the Williams, Arjoonsingh and Barnes. AV1 stated that Williams took her Birth Certificate and threatened to harm her family if she refused to prostitute for the group. AV1's cell phone was also confiscated by Williams, Arjoonsingh and Barnes.

According to AV1, Arjoonsingh, AKA "Neela", created the Backpage advertisements which facilitated the commercial sex acts in each state. Neela used several tablet devices to take pictures and to post these ads. Neela also used multiple track phones to communicate with the "tricks" and would purchase pre-paid money cards to pay for the ads and to add minutes to these pre-paid phones. On one occasion, Neela choked AV1 when she attempted to leave the group.

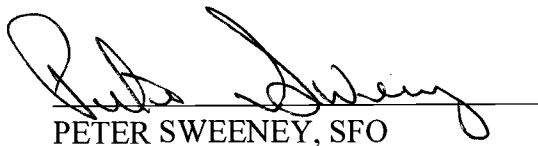
AV1 explained to law enforcement that Melissa Barnes, AKA "Bubbles", also created Backpage advertisements to communicate with the various "tricks" and admitted to prostitution acts in various states. Barnes also answered the cell phones and set up dates for the prostitution.

These two female defendants, Arjoonsingh and Barnes, took turns watching Ashley. Williams did not want AV1 left alone.

AV1 was transported to the following cities and states by Williams, Arjoonsingh and Barnes to prostitute: San Antonio, Texas; Dallas, Texas; Houston, Texas; Louisiana, Georgia, South Carolina, and Charlotte, North Carolina.

Charlotte law enforcement recovered multiple cell phones from the defendants' motel rooms which AV1 states were used to purchase the online advertisements. Charlotte law enforcement also recovered multiple internet advertisements depicting AV1 as an escort.

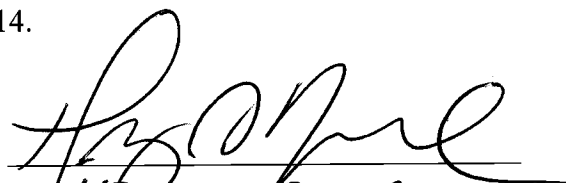
Based on the above facts, I believe probable cause exists to show that defendants: Jonathan Williams, Neela Arjoonsingh, and Melissa Barnes did violate Title 18, United States Code, Section 2421, Transportation Generally, also known as The Mann Act, as well as Aiding and Abetting, Title 18, United States Code, Section 2. Specifically, the defendants knowingly transported AV1 in interstate commerce, with intent that she engage in prostitution.



PETER SWEENEY, SFO

Federal Bureau of Investigation

SWORN TO BEFORE ME ON MAY 26, 2014.


HENRY J. REMPORAD
United States Magistrate Judge
Western District of Texas